

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

DEFENDANT'S SUPPLEMENTARY REQUESTED FOLLOW-UP QUESTIONS

The defendant, Dzhokhar Tsarnaev, by and through counsel, hereby files under seal a supplementary request for voir dire questioning on the effect on potential jurors of evidence linking the defendant or the Boston Marathon bombing to propaganda produced by the organization al-Qaeda in the Arabian Peninsula (AQAP), which yesterday claimed credit for last week's terror attack on the staff of the magazine *Charlie Hebdo* and others in Paris. Maggie Michael, *Yemen's Al Qaeda claims responsibility for Paris attack*, Boston Globe (January 14, 2015). The additional questions that the defendant asks to pose to each prospective juror are the following:

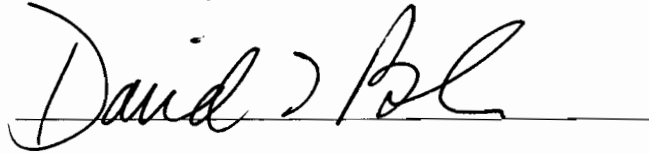
S-1. If there were evidence presented at trial that the defend possessed literature advocating terrorist attacks against Western civilian targets that was produced and distributed by the organization al-Qaeda in the Arabian Peninsula (AQAP), would that affect your ability to be fair and impartial in deciding his guilt or innocence, or his sentence if convicted?

S-2. If you found the defendant guilty of carrying out the Boston Marathon bombing, and the evidence showed that on-line materials produced by al-Qaeda in the Arabian Peninsula (AQAP) inspired or aided the commission of the Marathon attack, would that prevent you from truly considering a sentence of life imprisonment rather than the death penalty as the defendant's punishment?

S-3. [This request is made subject to the Court's ruling on Defendant's Motion to Limit Testimony of Government Terrorism Experts [DE 865]]. If the evidence showed that the defendant was inspired or aided to carry out the Marathon bombing by al-Qaeda in the Arabian Peninsula (AQAP), and that AQAP is the same organization that has claimed responsibility for the recent terrorist attacks in Paris, would that prevent you from truly considering a sentence of life imprisonment rather than the death penalty as the defendant's punishment?

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

A handwritten signature in black ink, appearing to read "David I. Bruck", is written over a horizontal line.

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Certificate of Service

I hereby certify that this document was personally served upon counsel for the government this 14th day of January, 2015.

A handwritten signature in black ink, reading "David J. Bell". The signature is written in a cursive style with a large, stylized "D" and "B".